

## **REQUEST FOR RECONSIDERATION**

Reconsideration of the present application is respectfully requested.

Claims 1-8 are pending in the application.

The Examiner maintained the rejection of Claims 1-8 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,915,345 to *Tummala et al.* (hereinafter *Tummala*) in view of U.S. Patent No. 6,751,729 to *Giniger et al.* (hereinafter *Giniger*).

Regarding this rejection, and in the Response to Arguments, the Examiner explained how he believes *Tummala* teaches the recitations that Applicant previously argued were not taught in the reference. Particularly, the Examiner alleged how he believes the “a home agent” recitation in Claim 1 is taught in *Tummala*.

However, Applicant respectfully asserts that *Tummala* does not specifically set forth that location information about the VPN service for the MN is stored when the HA receives a location registration request message from the MN for the VPN service, as recited in Claims 1 and 4, and *Giniger* fails to cure this deficiency. Respectfully, Applicant asserts that this is at least one distinguishing aspect of the rejected claims over *Tummala* and *Giniger*.

Further, the Examiner alleged that information about the VPN service is disclosed in col. 9, lines 27-28 and col. 9, lines 33-39 of *Tummala*. However, Applicant respectfully disagrees with the Examiner’s opinion based on the following reasons. *Tummala* discloses in the cited lines that routing devices, such as a foreign agent or home agent, know about the existence of an AAA server on a network, and that since the AAA servers 204, 220, 245 and 265 form a secure network for communications, VPN between the home network 200 and the foreign networks 215, 235 and 255 is established. However, Applicant respectfully cannot find any description about the information about the VPN service from *Tummala*, and *Giniger* fails to cure this deficiency.

In addition, based on col. 9, lines 35-40 of *Tummala*, the Examiner disagrees with Applicant's previous argument and considers the ISP server of the present claims as tantamount to the AAA server of *Tummala*. However, it is respectfully asserted that the AAA server of *Tummala* is a component arranged within the home network or the foreign network, whereas the ISP server of the present claims is for IP tunnelling connected between an ISP router in an HA network and an ISP router in an FA network. Therefore, the ISP server of the present claims is clearly distinct from the AAA server of *Tummala*, and it is respectfully asserted that *Giniger* fails to cure this deficiency in *Tummala*.

At least in view of the foregoing, it is respectfully submitted that the §103(a) rejection of Claims 1-8 is incorrect, and should be withdrawn. Withdrawal of the same is respectfully requested.

Independent Claims 1 and 4 are believed to be in condition for allowance. Additionally, without conceding the patentability per se of dependent Claims 2-3 and 5-8, these are likewise believed to be allowable, at least by virtue of their dependence on their respective independent claims.

Accordingly, all of the claims pending in the Application, namely, Claims 1-8, are believed to be in condition for allowance. Should the Examiner believe that a telephone conference or personal interview would facilitate resolution of any remaining matters, the Examiner may contact Applicant's attorney at the number given below.

Respectfully submitted,



Paul J. Farrell  
Reg. No. 33,494  
Attorney for Applicant

THE FARRELL LAW FIRM  
333 Earle Ovington Blvd., Suite 701  
Uniondale, New York 11553  
Tel: (516) 228-3565  
Fax: (516) 228-8475  
PJF/RCC/lb